

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

UNITED STATES OF AMERICA,

Plaintiff,

No. 2:19-CV-307

JASVIT S. TAHIM,

Defendant.

COMPLAINT

Plaintiff, the United States of America, by and through its undersigned attorneys, brings this complaint against Defendant JASVIT S. TAHIM, and alleges the following:

I. NATURE OF THIS ACTION

Starting as early as 2015 and continuing to the present, Defendant has conducted financial transactions with large sums of illegally obtained money, knowing that his transactions are designed to conceal the nature, source, location, ownership, and control of proceeds. Defendant's conduct includes knowingly receiving money obtained via fraud and then immediately transmitting the same money to accomplices in India.

Defendant conducts U.S. operations for a technical-support scheme based in India. The scheme operates by fraudulently inducing consumers, including principally elderly consumers, to purchase phony or otherwise misrepresented technical-support services related to computers

1 or other electronic devices, and to make further payments based on additional fraudulent
2 misrepresentations.

3 The United States seeks to prevent continuing and substantial injury to the United States
4 and victims by bringing this action for a permanent injunction and other equitable relief under
5 18 U.S.C. § 1345. The United States seeks to enjoin the ongoing commission of banking law
6 violations as defined in 18 U.S.C. § 3322(d), including money laundering in violation of 18
7 U.S.C. § 1956(a)(1)(B) and international money laundering in violation of 18 U.S.C.
8 § 1956(a)(2)(B).

9 **II. JURISDICTION AND VENUE**

10 This Court has jurisdiction over this action under 18 U.S.C. § 1345 and 28 U.S.C.
11 §§ 1331 and 1345.

12 The United States District Court for the Western District of Washington is a proper
13 venue for this action under 28 U.S.C. § 1391(b)(1) & (b)(2) because Defendant is a resident of
14 this district and because a substantial part of the events or omissions giving rise to this
15 Complaint occurred in this district.

16 **III. PARTIES**

17 Plaintiff is the United States.

18 Defendant Jasvit S. Tahim, is a resident of this district, residing in Shoreline,
19 Washington. In connection with the matters alleged herein, Defendant transacts and has
20 transacted business in this district. Defendant is the owner and principal of multiple
21 companies, including County Solutions LLC, Maxus Therapy LLC, and Pacific Gate Solutions
22 LLC.

IV. FACTS

A. Defendant's Role in an Ongoing Technical-Support Fraud Scheme

Defendant conducts U.S. operations for a large-scale technical-support fraud scheme that targets victims throughout the United States. Since at least as early as 2015, telemarketers based in India have used telephone calls and the infrastructure maintained by Defendant to operate the technical-support scheme. Telemarketers working for the scheme fraudulently pose as technicians to induce consumers, including principally elderly consumers, to purchase phony or otherwise misrepresented technical-support services, and to make further payments based on additional fraudulent misrepresentations. Telemarketers contact consumers by means such as placing cold calls; paying search engines to place advertisements for technical computer services; and by using pop-up advertisements disguised as security alerts on computers or other electronic devices that direct consumers to immediately call a telephone number to protect their computer or other electronic device. The telemarketers often falsely claim to work for or be affiliated with large, well-known technology companies.

Once a telemarketer has a consumer on the phone, the telemarketer emphasizes the need for immediate action, and claims that the consumer's computer is at risk and that the telemarketer can assist but first needs remote access to the computer or device. Once remotely connected, the telemarketer purports to confirm the existence of a serious computer virus or other threat to the consumer's computer or device, sometimes claiming that hackers have already taken over the consumer's computer or email accounts and displaying a screen purporting to show, in real time, that the device was undergoing a further hacking attack as the telemarketer and consumer spoke. Imparting a sense of urgency, the telemarketer then claims

1 that he will install expensive and high-quality network security software to resolve the threat in
 2 exchange for a substantial sum of money.

3 After purportedly installing high-quality network security software, the telemarketer
 4 instructs the consumer to pay. At times, consumers have been asked to pay through an online
 5 credit-card payment system that deposit funds into one of Defendant's bank accounts. At other
 6 times, consumers have been asked to provide their personal checking-account information,
 7 which is then used to generate remotely-created checks made payable to one of Defendant's
 8 bank accounts. Each consumer is charged between several hundred and several thousand
 9 dollars.

10 At times during the scheme, consumers who have already paid Defendant once for
 11 technical-support receive subsequent calls, during which telemarketers working for the scheme
 12 give consumers phony new reasons they must purchase additional security software to avoid
 13 serious new computer viruses or other threats to their devices.

14 At times during the scheme, telemarketers purport to offer refunds to victims. But,
 15 instead of refunding money to victims, the telemarketers actually move money within the
 16 consumers' online bank accounts to convince the victims that too much money was refunded.
 17 The telemarketers then induce victims to send payments, purportedly to reimburse the "over-
 18 refund." Victims have lost hundreds or thousands of dollars to such bogus refund schemes.

19 The scheme's perpetrators use Defendant and his U.S. corporate entities to facilitate
 20 their schemes by (a) maintaining the schemes' infrastructure, including (b) receiving victim
 21 payments and (c) generally providing a veneer of domestic legitimacy.

B. Ongoing Banking Law Violations

Defendant conducts financial transactions to benefit an international fraud scheme, knowing that the money he receives and transmits is obtained fraudulently, and knowing that his transactions are designed to conceal the scheme. Defendant receives financial compensation for this conduct, often by transmitting to his accomplices 90% of the amounts that he receives and keeping the remaining 10% for himself.

Beginning at least as early as 2015, Defendant has knowingly accepted hundreds of thousands of dollars from multiple fraud victims and then transmitted most of that money to accomplices in the technical-support telemarketing fraud scheme.

Between December 12, 2017, and May 22, 2018 alone, Defendant transmitted over \$320,000, in dozens of transmissions, to accomplices in India. Defendant designated tens of thousands of dollars in these transmissions as payments for “Call Center Fees.”

C. Defendant's Knowledge of Fraud, Intent to Conceal the Nature, Source, Location, Ownership, or Control of Proceeds, and Intent to Evade Transaction Reporting Requirements

On information and belief, Defendant has engaged in the financial transactions alleged in Paragraphs 14 through 16 with knowledge that the monies he receives from consumers are obtained by the fraud scheme or other specified unlawful activity. On information and belief, Defendant has engaged in such financial transactions knowing that the transmissions are designed in whole or part to conceal or disguise the nature, source, location, ownership, or control of proceeds, and has transmitted such funds to India with the intent to promote the carrying on of specified unlawful activity.

D. **Harm to the United States**

The United States is suffering continuing and substantial injury from Defendant's banking law violations.

Defendant is continuing to facilitate his banking law violations. Absent injunctive relief by this Court, Defendant will continue to cause continuing and substantial injury to the United States and victims.

COUNT I

(18 U.S.C. § 1345 – Injunctive Relief)

The United States re-alleges and incorporates by reference Paragraphs 1 through 22 of this Complaint as though fully set forth herein.

By reason of the conduct described herein, Defendant has committed, is committing, and is about to commit banking law violations as defined in 18 U.S.C. § 3322(d), including money laundering and international money laundering with the intent to promote the carrying on of specified unlawful activity in violation of 18 U.S.C. § 1956(a)(1)(A)(i) and (a)(2)(A); and money laundering and international money laundering knowing that the transaction is designed in whole or in part to conceal or disguise the nature, the location, the source, the ownership, or the control of the proceeds of specified unlawful activity, in violation of 18 U.S.C. § 1956(a)(1)(B)(i), (a)(2)(B)(i),

Because Defendant is committing or about to commit banking law violations as defined in 18 U.S.C. § 3322(d), the United States is entitled, under 18 U.S.C. § 1345, to seek a permanent injunction restraining all future banking law violations and any other action that this Court deems just to prevent a continuing and substantial injury to the United States.

As a result of the foregoing, Defendant's conduct should be enjoined pursuant to 18 U.S.C. § 1345.

VI. PRAYER FOR RELIEF

WHEREFORE, Plaintiff, United States of America, requests of the Court the following relief:

That the Court issue a permanent injunction, pursuant to 18 U.S.C. § 1345, ordering that Defendant is restrained from engaging, participating, or assisting in money laundering or international money laundering, and any money transmitting business; and

That the Court order such other and further relief as the Court shall deem just and proper.

11

11

1 Respectfully submitted this 1st day of March, 2019.

2 ANNETTE HAYES
3 United States Attorney

4 *s/ Kayla C. Stahman*
5 KAYLA C. STAHLMAN, CA #228931
6 Assistant United States Attorney
7 United States Attorney's Office
8 700 Stewart Street, Suite 5220
9 Seattle, Washington 98101-1271
10 Phone: 206-553-7970
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12 Email: kayla.stahman@usdoj.gov

13 GUSTAV W. EYLER
14 Acting Director
15 Consumer Protection Branch

16 */s/ Daniel K. Crane-Hirsch*
17 Daniel K. Crane-Hirsch
18 Consumer Protection Branch
19 United States Department of Justice
20 P.O. Box 386
21 Washington, DC 20044
22 Tel.: 202-616-8242
23 Fax: 202-514-8742
Email: daniel.crane-hirsch@usdoj.gov

15 Counsel for United States of America

CERTIFICATE OF SERVICE

The undersigned hereby certifies that he is an employee in the Office of the United States Attorney for the Western District of Washington and is the person of such age and discretion as to be competent to serve papers;

It is further certified that on this day, I mailed by United States Postal Service said pleading to Defendant, addressed as follows:

Jasvit S. Tahim
2229 NE 197th PL
Shoreline WA, 98155

Dated this 1st day of March, 2019.

/s/ Thomas Everett
THOMAS EVERETT
Paralegal
United States Attorney's Office
700 Stewart Street, Suite 5220
Seattle, Washington 98101-1271
Phone: (206) 553-7970
Fax: (206) 553-0882
E-mail: thomas.everett@usdoj.gov

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CIVIL COVER SHEET

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

I. (a) PLAINTIFFS

UNITED STATES OF AMERICA

(b) County of Residence of First Listed Plaintiff _____
(EXCEPT IN U.S. PLAINTIFF CASES)

(c) Attorneys (Firm Name, Address, and Telephone Number)
Kayla Stahman, Assistant United States Attorney
United States Attorney's Office
700 Stewart St. Suite 5220, Seattle, WA 98102, 206-553-7970

DEFENDANTS

Jasvit S. Tahim

County of Residence of First Listed Defendant King
(IN U.S. PLAINTIFF CASES ONLY)NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF
THE TRACT OF LAND INVOLVED.

Attorneys (If Known)

II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

<input checked="" type="checkbox"/> 1 U.S. Government Plaintiff	<input type="checkbox"/> 3 Federal Question (U.S. Government Not a Party)
<input type="checkbox"/> 2 U.S. Government Defendant	<input type="checkbox"/> 4 Diversity (Indicate Citizenship of Parties in Item III)

III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)

	PTF	DEF	PTF	DEF
Citizen of This State	<input type="checkbox"/> 1	<input type="checkbox"/> 1	Incorporated or Principal Place of Business In This State	<input type="checkbox"/> 4 <input type="checkbox"/> 4
Citizen of Another State	<input type="checkbox"/> 2	<input type="checkbox"/> 2	Incorporated and Principal Place of Business In Another State	<input type="checkbox"/> 5 <input type="checkbox"/> 5
Citizen or Subject of a Foreign Country	<input type="checkbox"/> 3	<input type="checkbox"/> 3	Foreign Nation	<input type="checkbox"/> 6 <input type="checkbox"/> 6

IV. NATURE OF SUIT (Place an "X" in One Box Only)

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES
<input type="checkbox"/> 110 Insurance	PERSONAL INJURY	PERSONAL INJURY	<input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881	<input type="checkbox"/> 375 False Claims Act
<input type="checkbox"/> 120 Marine	<input type="checkbox"/> 310 Airplane	<input type="checkbox"/> 365 Personal Injury - Product Liability	<input type="checkbox"/> 422 Appeal 28 USC 158	<input type="checkbox"/> 376 Qui Tam (31 USC 3729(a))
<input type="checkbox"/> 130 Miller Act	<input type="checkbox"/> 315 Airplane Product Liability	<input type="checkbox"/> 367 Health Care/ Pharmaceutical Personal Injury Product Liability	<input type="checkbox"/> 423 Withdrawal 28 USC 157	<input type="checkbox"/> 400 State Reapportionment
<input type="checkbox"/> 140 Negotiable Instrument	<input type="checkbox"/> 320 Assault, Libel & Slander	<input type="checkbox"/> 368 Asbestos Personal Injury Product Liability	PROPERTY RIGHTS	<input type="checkbox"/> 410 Antitrust
<input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment	<input type="checkbox"/> 330 Federal Employers' Liability	<input type="checkbox"/> 370 Other Fraud	<input type="checkbox"/> 820 Copyrights	<input type="checkbox"/> 430 Banks and Banking
<input type="checkbox"/> 151 Medicare Act	<input type="checkbox"/> 340 Marine	<input type="checkbox"/> 371 Truth in Lending	<input type="checkbox"/> 830 Patent	<input type="checkbox"/> 450 Commerce
<input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excludes Veterans)	<input type="checkbox"/> 345 Marine Product Liability	<input type="checkbox"/> 380 Other Personal Property Damage	<input type="checkbox"/> 835 Patent - Abbreviated New Drug Application	<input type="checkbox"/> 460 Deportation
<input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits	<input type="checkbox"/> 350 Motor Vehicle	<input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 840 Trademark	<input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations
<input type="checkbox"/> 160 Stockholders' Suits	<input type="checkbox"/> 355 Motor Vehicle Product Liability		SOCIAL SECURITY	<input type="checkbox"/> 480 Consumer Credit
<input type="checkbox"/> 190 Other Contract	<input type="checkbox"/> 360 Other Personal Injury		<input type="checkbox"/> 861 HIA (1395ff)	<input type="checkbox"/> 490 Cable/Sat TV
<input type="checkbox"/> 195 Contract Product Liability	<input type="checkbox"/> 362 Personal Injury - Medical Malpractice		<input type="checkbox"/> 862 Black Lung (923)	<input type="checkbox"/> 850 Securities/Commodities Exchange
<input type="checkbox"/> 196 Franchise			<input type="checkbox"/> 863 DIWC/DIWW (405(g))	<input checked="" type="checkbox"/> 890 Other Statutory Actions
REAL PROPERTY	CIVIL RIGHTS	PRISONER PETITIONS	FEDERAL TAX SUITS	<input type="checkbox"/> 891 Agricultural Acts
<input type="checkbox"/> 210 Land Condemnation	<input type="checkbox"/> 440 Other Civil Rights	Habeas Corpus:	<input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant)	<input type="checkbox"/> 893 Environmental Matters
<input type="checkbox"/> 220 Foreclosure	<input type="checkbox"/> 441 Voting	<input type="checkbox"/> 463 Alien Detainee	<input type="checkbox"/> 871 IRS—Third Party 26 USC 7609	<input type="checkbox"/> 895 Freedom of Information Act
<input type="checkbox"/> 230 Rent Lease & Ejectment	<input type="checkbox"/> 442 Employment	<input type="checkbox"/> 510 Motions to Vacate Sentence		<input type="checkbox"/> 896 Arbitration
<input type="checkbox"/> 240 Torts to Land	<input type="checkbox"/> 443 Housing/ Accommodations	<input type="checkbox"/> 530 General		<input type="checkbox"/> 899 Administrative Procedure Act/Review or Appeal of Agency Decision
<input type="checkbox"/> 245 Tort Product Liability	<input type="checkbox"/> 445 Amer. w/Disabilities - Employment	<input type="checkbox"/> 535 Death Penalty		<input type="checkbox"/> 950 Constitutionality of State Statutes
<input type="checkbox"/> 290 All Other Real Property	<input type="checkbox"/> 446 Amer. w/Disabilities - Other	Other:		
	<input type="checkbox"/> 448 Education	<input type="checkbox"/> 540 Mandamus & Other	<input type="checkbox"/> 462 Naturalization Application	
		<input type="checkbox"/> 550 Civil Rights	<input type="checkbox"/> 465 Other Immigration Actions	
		<input type="checkbox"/> 555 Prison Condition		
		<input type="checkbox"/> 560 Civil Detainee - Conditions of Confinement		

V. ORIGIN (Place an "X" in One Box Only)

<input checked="" type="checkbox"/> 1 Original Proceeding	<input type="checkbox"/> 2 Removed from State Court	<input type="checkbox"/> 3 Remanded from Appellate Court	<input type="checkbox"/> 4 Reinstated or Reopened	<input type="checkbox"/> 5 Transferred from Another District (specify) _____	<input type="checkbox"/> 6 Multidistrict Litigation - Transfer	<input type="checkbox"/> 8 Multidistrict Litigation - Direct File
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Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):
18 U.S.C. § 1345

Brief description of cause:

Injunction for money laundering, fraud.

VI. CAUSE OF ACTION

CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P. **DEMAND \$** CHECK YES only if demanded in complaint:
JURY DEMAND: Yes No

VII. REQUESTED IN COMPLAINT:
IF ANY

(See instructions):

JUDGE

DOCKET NUMBER

DATE

03/01/2019

FOR OFFICE USE ONLY

SIGNATURE OF ATTORNEY OF RECORD

RECEIPT #

AMOUNT

APPLYING IFP

JUDGE

MAG. JUDGE

UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

UNITED STATES OF AMERICA,

NO.

Plaintiff,

V.

JASVIT S. TAHIM,

**[PROPOSED] CONSENT DECREE AND
FINAL JUDGMENT**

Defendant.

CONSENT DECREE AND FINAL JUDGMENT

Plaintiff, United States of America (“Plaintiff”), commenced the above-captioned action in this Court with a complaint pursuant to 18 U.S.C. § 1345, alleging that Defendant, Jasvit S. Tahim, is committing or about to commit a banking law violation as defined in 18 U.S.C. § 3322(d), including international money laundering in violation of 18 U.S.C. § 1956(a)(2)(B).

18 Plaintiff and Defendant, *pro se*, wish to resolve Plaintiff's allegations without litigation and
19 jointly request and consent to the entry of this Consent Decree and Final Judgment ("Consent
20 Decree") without Defendant's admission of liability or wrongdoing. Defendant agrees to waive
21 service of the Summons and the Complaint.

1 Defendant has entered into this Consent Decree freely and without coercion. Defendant
2 further acknowledges that he has read the provisions of this Consent Decree, understands them,
3 and is prepared to abide by them.

4 **IT IS HEREBY ADJUDGED, ORDERED, AND DECREED as follows:**

5 1. This Court has jurisdiction over this matter and the parties pursuant to
6 18 U.S.C. § 1345 and 28 U.S.C. §§ 1331 and 1345. Venue is proper in this District under
7 28 U.S.C. § 1391(b) and (c).

8 2. Defendant neither admits nor denies the allegations in the Complaint. Only for
9 purposes of this action, Defendant admits the facts necessary to establish jurisdiction.

10 3. For purposes of this Consent Decree:

11 a. “Defendant” means Jasvit S. Tahim.

12 b. “Person” means an individual, a corporation, a partnership, or any other
13 entity.

14 c. “Funds” include any currency, check, money order, stored value card,
15 stored value card numbers, bank wire transmission, or other monetary value.

16 d. “Tech support business” refers to any person that claims to provide security
17 or technical support for computer or mobile devices or computer or mobile device-related
18 equipment.

19 e. “Money transmitting business” refers to a person who, for a fee, receives
20 funds from one person for the purpose of transmitting the funds, or providing access to the
21 funds, to another person.

22 f. “Fee” refers to a payment or compensation of any kind regardless of how
23 the payment or compensation is labeled, including but not limited to processing fees,

1 service fees, expediting fees, purchase fees, nominal fees, symbolic payments, gifts and
2 gratuities.

3 4. Upon entry of this Decree, Defendant is permanently prohibited and enjoined
4 from, directly or indirectly, assisting, facilitating, or participating in any tech support business or
5 money transmitting business.

6 5. Within five (5) days after entry of this Consent Decree, the Defendant is ordered
7 to submit to Postal Inspector Thomas Ninan a written acknowledgement of receipt of this
8 Consent Decree sworn under penalty of perjury. The statement shall be addressed to:

9 U.S. Postal Inspector Thomas Ninan
10 U.S. Postal Inspection Service
c/o U.S. Department of Justice
11 Patrick Henry Building
First Floor
601 D St. NW
12 Washington, DC 20579

13 6. The Consent Decree shall not be modified except in writing by Plaintiff and the
14 Defendant and approved by the Court.

15 7. This Consent Decree shall constitute a final judgment and order in this action.

16 8. This Court retains jurisdiction of this action for the purpose of enforcing or
17 modifying this Consent Decree and for the purpose of granting such additional relief as may be
18 necessary or appropriate.

19
20 **DONE AND ORDERED** in Chambers at Seattle, Washington, this _____ day of
21 _____, 2019.

1 APPROVED AND ENTERED BY THIS COURT

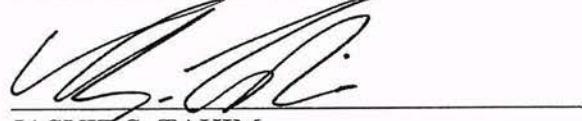
2 Dated this ____ day of _____, 2019.

3 HONORABLE _____
4 United States District Judge

5 We hereby consent to the entry of the foregoing Decree:

6 FOR DEFENDANT JASVIT S. TAHIM

7 Dated: January 15, 2019


8 JASVIT S. TAHIM

9 FOR PLAINTIFF THE UNITED STATES OF
10 AMERICA

11 ANNETTE HAYES
12 United States Attorney

13 *March 1*
14 Dated: January _____, 2019

15 By: s/ Kayla C. Stahman
16 KAYLA C. STAHPMAN, CA #228931
17 Assistant United States Attorney
18 United States Attorney's Office
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17 GUSTAV W. EYLER
18 Acting Director
19 Consumer Protection Branch

20 By: /s/ Daniel K. Crane-Hirsch
21 Daniel K. Crane-Hirsch
22 Trial Attorney
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Counsel for United States of America

CERTIFICATE OF SERVICE

The undersigned hereby certifies that he is an employee in the Office of the United States Attorney for the Western District of Washington and is the person of such age and discretion as to be competent to serve papers;

It is further certified that on this day, I mailed by United States Postal Service said pleading to Defendant, addressed as follows:

Jasvit S. Tahim
2229 NE 197th PL
Shoreline WA, 98155

Dated this 1st Day of March, 2019.

/s/ Thomas Everett
THOMAS EVERETT
Paralegal
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